

ANSWER

THOMAS O. STULTZ, widower : NO. 16372 EQUITY
VS. : IN THE CIRCUIT COURT
BAXTER DRONEBURG and
NEVA DRONEBURG, his wife, et al : FOR FREDERICK COUNTY

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Answer of Helen Crum and Edward Crum, her husband, to the Bill of Complaint filed in this cause, respectfully represents unto your Honorable Court:

FIRST: That your Respondents admit the allegations contained in the first, second and third paragraphs of said Bill of Complaint except that the name of Mary Neiser and her husband's name, Joseph Neiser, should be Mary Hiser and Joseph Hiser.

SECOND: That your Respondents neither admit nor deny the allegations contained in the fourth paragraph of said Bill of Complaint.

And answering said Bill of Complaint generally, your Respondents say that they feel that it would be to the best interest and advantage of all parties concerned that the property described in said Bill of Complaint be sold and the proceeds be divided among the parties in interest according to their respective rights. And that they further consent to the relief prayed in said Bill of Complaint.

Having fully answered all and in singular the allegations of said Bill of Complaint, your Respondents pray to be hence dismissed with their reasonable costs.


Solicitor for Respondents

STATE OF MARYLAND

FREDERICK COUNTY, TO-WIT:

I hereby certify that on this 28th day of April, 1948, before me, the subscriber, a Notary Public of the State of Maryland, in and for Frederick County, personally appeared Helen Crum and Edward Crum, her husband, and made oath in due form of law that the matters and things stated in the foregoing Answer are true to the best of their knowledge, information and belief.

WITNESS my Hand and Notarial Seal.
Service of copy admitted this 28th day of April, 1948.

Filed April 28, 1948 William M. Stern Attorney for Plaintiff


Notary Public

